



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

MEMORANDUM

DATE: January 28, 1987
TO: Engineering Division Technical Staff
FROM: Sanford M. Weiss, Director of Engineering /s/ SMW
SUBJECT: Rule Interpretations

You all have been under considerable pressure to handle the Division's increasing workload (and I thank each of you for your efforts) but in our collective eagerness to handle the problems, we have worked our way into a situation which must be remedied. Because of the production pressures we interpret rules or go to District Counsel for help in interpreting rules. The process seems to be very casual. There are a number of concerns that I have with the present process.

1. The resulting interpretations are not memorialized for future reference.
2. The resulting interpretations may cross unit and section boundaries and the others do not know the results.
3. There is no collective decision-making when several units and sections are involved.

To eliminate those problems I must ask you to take some additional steps in interpreting the rules. If the rule interpretation involves only your operations, please consult with your supervisor and manager. New and significant interpretations are not to be made at the unit level. The manager will consider the possibility of other units involvement and where appropriate inform me of the problem so that I can convene the Division's managers to reach a solution and interpretation. Finally all decisions must be memorialized and a copy sent to me.

I realize that the permit process may be slowed in some instances, but I believe that the above process will help us all in the long run by avoiding problems in the future.

SMW:cpq